

United States District Court
Western District of Michigan
Southern Division

Ganiyu Ayinla Jaiyeola,

Plaintiff,

v

Jennie Boldish Bryan,

Defendant.

Case No: 1:22-cv-844

Hon. Jane M. Beckering

Defendant's Motion for Sanctions under Fed. R. Civ. P. 11

Defendant Jennie Boldish Bryan files this Motion for Sanctions under Fed. R. Civ. P. 11 and state in support as follows:

1. As set forth more fully in the accompanying brief, Plaintiff should be sanctioned under Fed. R. Civ. P. 11 because the complaint was presented to the Court for the improper purpose of harassing and defaming Defendant; the claims are not warranted by existing law or by any non-frivolous argument for extending, modifying, or reversing existing law or for establishing new law; and the factual contentions lack any evidentiary support and instead are demonstrably false.

2. Under L.R. 7.1(a), Defendant hereby certifies that she made reasonable efforts to obtain concurrence in the relief sought from Plaintiff, who is appearing in this action pro se, by serving this motion upon Plaintiff at least 21 days before filing and requesting dismissal of the complaint. Defendant was unable to obtain concurrence in the relief sought.

For the foregoing reasons and as set forth in brief filed in support of this motion, Defendant Jennie Boldish Bryan respectfully requests that this Court grant this motion for sanctions and award her all other appropriate relief.

Dated: November 7, 2022

By: /s/ Jennie Boldish Bryan
Jennie Boldish Bryan (P38714)
Pro Se Defendant
99 Monroe Ave. N.W., Suite 1100
Grand Rapids, MI 49503
(616) 732-5000
jbryan@msblaw.com